

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION**

TROY K. SCHEFFLER,

15 CV 4436 DSD/SER

Plaintiff,

vs.

**PLAINTIFF'S MEMORANDUM IN
OPPOSITION TO DEFENDANT'S
MOTION FOR SANCTIONS: DECLARATION**

GURSTEL CHARGO, P.A.,

Defendant.

COMES NOW THE DECLARANT AND STATES THE FOLLOWING:

1. My name is Peter J. Nickitas.
2. I am attorney for the Plaintiff, Troy K. Scheffler.
3. I attach and incorporate the following documents to this declaration:
 - A. Exhibit A: Safe Harbor Notice with Corresponding Responses, filed and served on 27 September 2016;
 - B. Exhibit B, Safe Harbor Notice, 6 September 2016
 - C. Exhibit C: Declaration of Troy K. Scheffler;
 - D. Exhibit D: 19 August 2016 Letter from Manuel Newburger
 - E. Exhibit E: 27 August 2016 Letter to Opposing Counsel Amy Goltz
 - F. Exhibit F: 29 August 2016 Letter to Magistrate Judge Rau
 - G. Exhibit G: 2 September 2016 Email cover to Magistrate Judge Rau
 - H. Exhibit H: 6 September 2016 Letter to Magistrate Judge Rau
 - I. Exhibit I: 26 September 2016 Letter from Manuel Newburger
 - J. Exhibit J: 7 October 2016 Letter to Opposing Counsel

K. Exhibit K: 27 September 2016 Email to Opposing Counsel with attached
response to safe harbor letter

4. NOTHING FOLLOWS FROM YOUR DECLARANT.

12 June 2017

Respectfully:

/s/ *Peter J. Nickitas* (electronically signed)

Peter J. Nickitas

12 June 2017

Respectfully:

Peter J. Nickitas Law Office, LLC

/s/ *Peter J. Nickitas* (electronically signed)

Peter J. Nickitas

Attorney for Plaintiff, MN Att'y #212313

431 S. 7th St., Suite 2446

Minneapolis, MN 55415

612.440.7285/651-238-3445/1.888.389.7890

peterjnickitaslawllc@gmail.com